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March 5, 2019

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: WT Docket No. 17-200**  
***Ex Parte* Presentation**

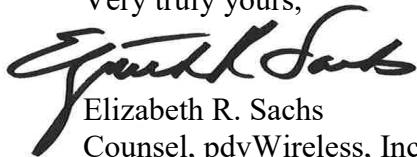
Dear Ms. Dortch:

On March 1, 2019, Chris Guttman-McCabe of CGM Advisors, consultant to pdvWireless, Inc. ("PDV"), and undersigned counsel for PDV, met in person or by telephone with the Wireless Telecommunications Bureau staff listed below. The parties discussed certain elements of the draft Notice of Proposed Rulemaking in this proceeding. Specifically, the PDV representatives requested clarification of the materials proposed to be included in the Transition Plan, the applicability of proposed Section 27.1521, as well as protection criteria for incumbents outside a county boundary, the proposed requirement that a prospective broadband licensee hold all 20 blocks of geographically licensed 900 MHz SMR spectrum in the county, and options for PDV to continue relocating incumbents on a voluntary basis during the pendency of the proceeding. The PDV representatives also suggested approaches, in addition to auctions, to address holdouts by incumbents whose systems present no usual complexities and for which comparable facilities could be made available.

This letter is being filed electronically, in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in these proceedings.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,



Elizabeth R. Sachs  
Counsel, pdvWireless, Inc.

cc (via email):  
Lloyd Coward  
Stana Kimball  
Roger Noel (participated by phone)  
Becky Schwartz (participated by phone)  
Scot Stone  
Joel Taubenblatt (participated by phone)